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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

ERIC JUNOD,

Defendant.

Hon. Matthew F. Leitman

Criminal No. 15-20621

VIO: 18 U.S.C. § 2252A(a)(2)
18 U.S.C. § 2252A(a)(5)
18 U.S.C. § 2422(b)
18 U.S.C. § 2251(a)
Forfeiture Allegations

_______________________________/

FILED
2016 JUN 30 P 2: 13
U.S. DIST. COURT CLERK
EAST. DIST. MICHIGAN
DETROIT

FIRST SUPERSEDING INDICTMENT

THE GRAND JURY CHARGES:

COUNT ONE

(18 U.S.C. § 2252A(a)(2) - *Distribution of Child Pornography*)

ERIC JUNOD.

On or about December, 2014, through August, 2015, in the Eastern District of Michigan, the defendant, ERIC JUNOD, did knowingly distribute child pornography as defined in 18 U.S.C. § 2256(8); and the images distributed by the defendant were mailed, shipped, and transported using the Internet, a means and facility of interstate or foreign commerce, and were mailed, shipped, and transported in or affecting interstate or foreign commerce by any means, including by computer, in violation of Title 18, United States Code, Section 2252A(a)(2).

COUNT TWO

(18 U.S.C. § 2252A(a)(2) - *Receipt of Child Pornography*)

ERIC JUNOD.

On or about July 30, 2014, through August 17, 2015, in the Eastern District of Michigan, the defendant, ERIC JUNOD, did knowingly receive child pornography as defined in 18 U.S.C. § 2256(8); and the images received by the defendant were mailed, shipped, and transported using the Internet, a means and facility of interstate or foreign commerce, and were mailed, shipped, and transported in or affecting interstate or foreign commerce by any means, including by computer, in violation of Title 18, United States Code, Section 2252A(a)(2).

COUNT THREE

(18 U.S.C. § 2252A(a)(5)(B) – *Possession of Child Pornography)*

ERIC JUNOD.

On or about August 17, 2015, within the Eastern District of Michigan, the defendant, ERIC JUNOD, knowingly possessed one or more computer hard drives, books, magazines, periodicals, and other material which contained child pornography, as defined in Title 18, United States Code, Section 2256(8), including but not limited to visual depictions of real minors, prepubescent minors and minors who had not attained twelve (12) years of age, engaged in sexually explicit conduct, that had been shipped and transported using any means and facility of interstate and foreign commerce, had been shipped and/or transported in and affecting interstate and foreign commerce, and were produced using materials that have been mailed, shipped and transported in and affecting interstate and foreign commerce by any means, in violation of Title 18, United States Code, Section 2252A(a)(5)(B).

COUNT FOUR

(18 U.S.C. § 2251(a) – *Attempted Production and/or Production of Child Pornography*)

ERIC JUNOD.

On or about July 2015 through August 17, 2015, in the Eastern District of Michigan, Southern Division, and elsewhere, the defendant, ERIC JUNOD, did employ, use, persuade, induce, entice, and coerce a fifteen year-old female minor, Minor Victim One (MV-1), and other minor children, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, and, the defendant knew and had reason to know that such visual depiction was intended to be transported and transmitted, using any means or facility of interstate or foreign commerce, was actually transported and transmitted using any means or facility of interstate or foreign commerce, and was produced and transmitted using materials that had been mailed, shipped, and transported and transmitted in interstate commerce, and attempted to do so, in violation of Title 18, United States Code, Section 2251(a).

COUNT FIVE

(18 U.S.C. § 2422(b) – *Attempted Online Coercion and Enticement and/or Online Coercion and Enticement of a Minor*)

ERIC JUNOD.

On or about August 5, 2015, through August 17, 2015, in the Eastern District of Michigan, Southern Division, and elsewhere, the defendant, ERIC JUNOD, did use a facility of interstate and foreign commerce, to knowingly persuade, induce, entice and coerce Minor Victim 1 (MV-1), and other minor children, who had not attained the age of 18 years to engage in sexual activity under such circumstances as would constitute a criminal offense, and attempted to do so, in violation of Title 18, United States Code, Section 2422(b).

FORFEITURE ALLEGATION

Upon conviction of the offense charged in Counts One through Five of the First Superseding Indictment, the defendant, ERIC JUNOD, shall, pursuant to 18 U.S.C. §§ 2253 and/or 2428 forfeit to the United States the following:

i. Any visual depiction described in 18 U.S.C. §§ 2251, 2251A, or 2252, 2252A, 2252B or 2260, or any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped, or received in violation of these subsections (Counts One, Two, Three, and Five);

ii. Any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such offenses (Counts One, Two, Three, and Five); and

iii. Any property, real or personal, used or intended to be used to commit or to promote the commission of such offense or any property traceable to such property, including, but not limited to items seized on August 17, 2015 (Counts One, Two, Three, and Five);

iv. Defendant's interest in any property, real or personal, that was used or intended to be used to commit or to facilitate the commission of such violation (Counts One, Two, Three and Five); and

v. Any property, real or personal, constituting or derived from any proceeds obtained, directly or indirectly, as a result of such violation.

If any of the property described in the paragraphs above as being forfeitable 18 U.S.C. §§ 2253 and/or 2428, as a result of any act or omission of the defendant --

a. cannot be located upon the exercise of due diligence;

b. has been transferred to, sold to, or deposited with a third party;

c. has been placed beyond the jurisdiction of this Court;

d. has been substantially diminished in value; or

e. has been commingled with other property which cannot be divided without difficulty;

the United States of America, pursuant to 21 U.S.C. § 853(p), intends to seek forfeiture of all other property of the defendant up to the value of the above described forfeitable property.

THIS IS A TRUE BILL.

s / Grand Jury Foreperson
GRAND JURY FOREPERSON

BARBARA L. MCQUADE
United States Attorney

s / Matthew A. Roth
MATTHEW A. ROTH
Assistant United States Attorney
Chief, General Crimes Unit

s / Mollie E. O'Rourke
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Date: June 30, 2016

United States District Court Eastern District of Michigan	**Criminal Case Cover**

Case:2:15-cr-20621
Judge: Leitman, Matthew F.
MJ: Stafford, Elizabeth A.
Filed: 09-30-2015 At 02:15 PM
INDI USA V. JUNOD (NA)

NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to complet

Reassignment/Recusal Information

This matter was opened in the USAO prior to August 15, 2008 [ ]

Companion Case Information	**Companion Case Number:**
This may be a companion case based upon **LCrR 57.10 (b)(4)**[1]:	**Judge Assigned:**
☐ **Yes** ☒ **No**	**AUSA's Initials:** MEO

Case Title: USA v. Eric Junod

County where offense occurred : Oakland County

Check One: ☒ **Felony** ☐ **Misdemeanor** ☐ **Petty**

____Indictment/____Information --- **no** prior complaint.
____Indictment/____Information --- based upon prior complaint **[Case number:]**
✓ Indictment/____Information --- based upon **LCrR 57.10 (d)** ***[Complete Superseding section below]***.

FILED
2016 JUN 30 P 2: 13
U.S. DIST. COURT CLERK
EAST. DIST. MICHIGAN
DETROIT

Superseding Case Information

Superseding to Case No: 15-cr-20621 **Judge:** Matthew F. Leitman

☐ Original case was terminated; no additional charges or defendants.
☐ Corrects errors; no additional charges or defendants.
☐ Involves, for plea purposes, different charges or adds counts.
☒ Embraces same subject matter but adds the additional defendants or charges below:

Defendant name	**Charges**	**Prior Complaint (if applicable)**
	18 U.S.C. Sec. 2251(a) 18 U.S.C. Sec. 2422(b)	

Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case.

June 30, 2016
Date

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Attorney Bar #:

[1] Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.

10/13/09